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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE NATIONAL SECURITY AGENCY TELECOMMUNICATIONS RECORDS LITIGATION	**No. M:06-cv-01791-VRW**
	STIPULATION TO EXTEND TIME FOR GOVERNMENT DEFENDANTS TO RESPOND TO AMENDED COMPLAINT
This Document Solely Relates To:	Courtroom: 6, 17th Floor Judge: Hon. Vaughn R. Walker
Al-Haramain Islamic Foundation et al. v. Bush, et al. (07-CV-109-VRW)	

Pursuant to Local Rule 6.1(a), the parties hereby stipulate and agree as follows to an extension of time for the Defendants in this action sued in their official capacity (hereafter "defendants" or "Government defendants") to respond to Plaintiffs' Amended Complaint filed on July 29, 2008.[1]

[1] The time in which the only defendant sued in his personal capacity (FBI Director Robert Mueller) would respond to the Amended Complaint is addressed by separate stipulation. *See* Dkt. 39 (07-CV-109-VRW).

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RECITALS

1. On July 2, 2008, this Court entered an order dismissing plaintiffs' claims under the Foreign Intelligence Surveillance Act ("FISA") without prejudice and with the right to file an amended complaint within 30 days of that order. *See* Dkt. 33 (07-CV-109-VRW), Order in *Al-Haramain Islamic Foundation et al. v. Bush et al.* (July 2, 2008) at 56.

2. On July 29, 2008, plaintiffs filed an amended complaint pursuant to the Court's July 2 Order. *See* Dkt. 35 (07-CV-109-VRW) (July 29, 2008).

3. The plaintiffs and Government defendants are conferring on a joint case management report that will set forth their views and any differences on further proceedings.

4. In the meantime, the parties agree that the Government defendants' response to the amended complaint should be deferred until a schedule for further proceedings is set by stipulation or by the Court upon review of a joint case management report and, in any event, would not be due before September 11, 2008.

STIPULATION

Pursuant to Local Rule 6.1(a), the parties hereby stipulate that the Government defendants' response to the amended complaint is deferred until a schedule for further proceedings is set by stipulation or by the Court upon review of a joint case management report and, in any event, would not be due before September 11, 2008.

DATED: July 31, 2008 Respectfully Submitted,

FOR PLAINTIFFS	**FOR GOVERNMENT DEFENDANTS**
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DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B

I, ANTHONY J. COPPOLINO, hereby declare pursuant to General Order 45, § X.B, that I have obtained the concurrence in the filing of this document from the other signatory listed below.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Executed on July 31, 2008, in the City of Washington, District of Columbia.

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